

**Exhibit "A"**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

Index No.:  
Date E-Filed

ISABEL SALE,

Plaintiff(s),

-against-

TARGET CORPORATION,

Defendant(s).

**SUMMONS**

Plaintiff designates SUFFOLK  
County as the place of trial.

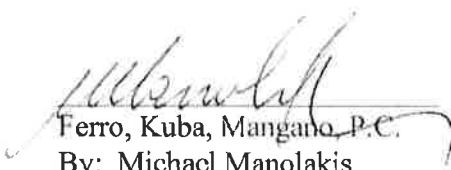
The basis of venue is:  
Plaintiff's Residence

Plaintiff resides at:  
36 Wildwood Trail  
Riverhead, NY 11901

**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Hauppauge, New York  
September 4, 2020

  
Ferro, Kuba, Mangano, P.C.  
By: Michael Manolakis  
Attorneys for Plaintiff(s)  
825 Veterans Highway  
Hauppauge, New York 11788  
(631) 581-9494  
Our File No. P16305-18

TO:  
Target Corporation  
1159 Old Country Road  
Riverhead, NY 11901

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

ISABEL SALE,

Plaintiff(s),

-against-

TARGET CORPORATION,

Defendant(s).

Index No.:

**VERIFIED COMPLAINT**

Plaintiff, by her attorneys, **Ferro, Kuba, Mangano, P.C.**, complaining of the Defendant, respectfully alleges, upon information and belief, as follows:

1. At the time of the commencement of this action, Plaintiff ISABEL SALE, resided in the County of Suffolk, State of New York.
2. That the cause of action alleged herein arose in the County of SUFFOLK, City and State of New York.
3. At the time of the commencement of this action, the Defendant TARGET CORPORATION was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.
4. At the time of the commencement of this action, the Defendant TARGET CORPORATION was and still is a foreign corporation duly authorized to do business in the State of New York.
5. At the time of commencement of this action, the Defendant TARGET CORPORATION maintained its principal place of business in the County of Suffolk, State of New York.

6. On July 13, 2018, and at all times herein mentioned, a premises existed in the County of Suffolk, City and State of New York with the address of 1150 Old Country Road (Route 58), Riverhead, New York.

7. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were owned by Defendant TARGET CORPORATION.

8. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were operated by Defendant TARGET CORPORATION.

9. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were maintained by Defendant.

10. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were controlled by Defendant TARGET CORPORATION.

11. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were repaired by Defendant TARGET CORPORATION.

12. On July 13, 2018, and at all times herein mentioned, the aforesaid premises were managed by Defendant TARGET CORPORATION.

13. On July 13, 2018, and at all times herein mentioned, it was the duty of Defendant TARGET CORPORATION to maintain the premises at 1150 Old Country Road, (Route 58), Riverhead, in the County of Suffolk, State of New York, in a reasonably safe condition.

14. On July 13, 2018, Plaintiff ISABEL SALE was lawfully on the aforesaid premises.

15. On July 13, 2018, Plaintiff ISABEL SALE was a lawful customer at the above-mentioned location.

16. On July 13, 2018, while Plaintiff was lawfully at the aforesaid location, Plaintiff was caused slip and fall and sustain severe and permanent injuries.

17. The above mentioned occurrence, and the results thereof, were caused by the negligence of the Defendants and/or said Defendant's servants, agents, employees and/or licensees

in the ownership, operation, management, maintenance and control of the floor and floor area at the aforesaid premises and in particular, at or near isle G35 (near the cookie section); in failing to properly maintain said floor and floor area; in allowing the floor to become wet, greasy, slippery, obstructed; in failing to inspect said floor area; in causing, permitting and allowing a trap, hazard and nuisance to be and exist; in failing to take any necessary steps to alleviate said condition; in failing to undertake proper and/or adequate safety studies and/or surveys, in failing to properly repair said floor area; in failing to erect barricades, or otherwise restrict use of aforesaid area to prevent a hazard, trap and nuisance from endangering persons lawfully upon the aforesaid premises and, more particularly, the plaintiff herein; in failing to warn persons lawfully upon the aforesaid premises and, more particularly, the plaintiff herein, of the subject hazard, trap and nuisance; in failing to avoid the aforesaid accident which was foreseeable; in failing to provide an alternate pathway and/or walkway which was safe to walk upon; in causing, allowing and permitting an obstruction to Plaintiff's safe passage at said location; in failing to have taken necessary steps and measures to have prevented the above mentioned location from being used while in said dangerous condition; in failing to give Plaintiff adequate and timely signal, notice or warning of said condition; in negligently and carelessly causing and permitting the above said floor and floor area to be and remain in said condition for an unreasonable length of time, resulting in hazard to Plaintiff and others; in failing to take suitable and proper precautions for the safety of persons on and using said floor and floor area; in failing to properly train, instruct and supervise its employee, agents, servants, to properly maintain said premises.

18. That, upon information and belief, Defendant had actual and constructive notice of this defective condition.

19. That, upon information and belief, Defendant and/or their employees caused and created the defective condition.

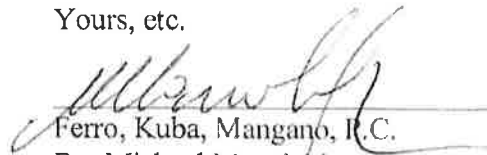
20. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

21. That because of the above, Plaintiff Isabel Sale was caused to sustain serious injuries and to have suffered pain, shock, mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

22. That by reason of the foregoing, Plaintiff ISABEL SALE was damaged in an amount in excess of the jurisdictional limits of the lower courts.

**WHEREFORE**, Plaintiff ISABEL SALE demands judgment against the Defendant in an amount in excess of the jurisdictional limits of the lower courts, together with costs and disbursements of this action.

Yours, etc.



Ferro, Kuba, Mangano, R.C.  
By: Michael Manolakis  
Attorneys for Plaintiff(s)  
825 Veterans Highway  
Hauppauge, New York 11788  
(631) 581-9494  
Our File No. P16305-18


STATE OF NEW YORK )  
 ) ss.:  
 COUNTY OF SUFFOLK )

Isabel Sale, being duly sworn, deposes and says:

I am a Plaintiff in the action herein: I have read the annexed

Complaint

and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my personal files.

  
 ISABEL SALE

Sworn to before me this  
 4 day of August, 2020.

  
 Notary Public

Ivonne Calzadilla  
 Notary Public, State of New York  
 No. 01CA4809324  
 Qualified in Suffolk County  
 Commission Expires on 06/30/2018 22